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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

CHARON L. BROWN,

Plaintiff,

VS.

OFFICER MECHAM, et al.,

Defendants.

CASE NO.: 2:15-CV-01670-APG-NJK

**STIPULATION TO EXTEND RULE 60
MOTION DEADLINE (SECOND REQUEST)**

Former Defendant NaphCare, Inc. (“NaphCare”), and Plaintiff Charon Brown stipulate as follows:

1. Whereas the Court granted NaphCare's original motion to dismiss on June 1, 2016 (ECF No. 22 (Order Granting ECF No. 12));
2. Whereas Malani Dale Kotchka-Alanes was appointed as pro bono counsel for Plaintiff Charon Brown on March 28, 2017;
3. Whereas Plaintiff issued a subpoena for NaphCare to testify at a deposition scheduled for May 30, 2017;
4. Whereas Plaintiff and NaphCare agreed to reschedule the deposition to accommodate the parties' and counsels' schedules;
5. Whereas Plaintiff and NaphCare previously stipulated to extend the Rule 60 motion deadline to July 13, 2017, which the Court granted (ECF Nos. 111 and 112);
6. Whereas the 30(b)(6) deposition of NaphCare will not be able to take place until later than

1 anticipated due to the travel and work schedules of (1) NaphCare's 30(b)(6) witness, (2)
2 NaphCare's counsel, and (3) counsel for Las Vegas Metropolitan Police Department
3 Defendants Mecham, Kegley, and Sands;

4 7. Therefore, NaphCare and Plaintiff agree to extend the Rule 60 motion deadline to August
5 11, 2017.

6 Dated this 14th day of June, 2017.

7 **LEWIS ROCA ROTHGERBER CHRISTIE LLP**

8 By: /s/ Malani Dale Kotchka-Alanes

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13 *Attorney for Plaintiff Charon L. Brown*

14 **ALVERSON, TAYLOR, MORTENSEN &**
15 **SANDERS**

16 By: /s/ Michael T. McLoughlin

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23 *Attorneys for Former Defendant NaphCare, Inc.*

24 **IT IS SO ORDERED:**

25 
26 UNITED STATES MAGISTRATE JUDGE

27 Dated: June 15, 2017